



(760) 878-0001  
FAX: (760) 878-2552

EMAIL: [mail@inyowater.org](mailto:mail@inyowater.org)  
WEB: <http://www.inyowater.org>

P.O. Box 337  
135 South Jackson Street  
Independence, CA 92526

**COUNTY OF INYO  
WATER DEPARTMENT**

June 8, 2011

California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, California 94236

Attention: Mr. Trevor Joseph

Subject: Inyo-Mono IRWMP Round 1 Draft Funding Recommendations

Dear Mr. Joseph:

This letter is submitted on behalf of Inyo County (a member of the Inyo-Mono IRWMP), and concerns CDWR's Draft Funding Recommendations for IRWMP implementation grants. Our region is large, rural, sparsely populated, and, with few exceptions, populated by disadvantaged communities. Although our region is sparsely populated, it is an important component in the statewide water supply network – this year, the region will provide 71% of the water supply for the City of Los Angeles.

A principal deficiency in the IRWM program has been that rural regions have lagged behind their urban counterparts in plan development and implementation funding. Proposition 84 sought to remedy this deficiency by giving preference to projects benefitting disadvantaged communities. In developing our IRWMP and implementation proposals, we strived for a plan and governance structure that favors full membership in the regional water management group for a diverse array of members, emphasizing participation by disadvantaged communities, as required by Proposition 84 and the Proposal Solicitation Package.

The Inyo-Mono region was unconditionally approved in the 2009 Regional Acceptance Process, and subsequently developed and submitted an IRWMP, without assistance from IRWM planning grant funds. Without planning funds, we had no means to hire consultants to prepare proposals. Instead, staff from various project proponents – board members for rural community service districts, water system operators, NGO staffers, and school administrators – developed our proposals based on the needs in their communities. Through considerable thought and effort, public vetting, and discussion among the

regional water management group, a set of proposals were developed and prioritized. These proposals represent the needs of our region, principally support for small water systems in isolated disadvantaged communities. These water systems are subject to the same water quality standards and maintenance challenges as larger systems, without the revenue base or economies of scale that larger systems enjoy.

In reviewing the draft funding recommendations, other regional plans and governance structures, and the types of projects funded, it is evident that the proposal evaluation process used by CDWR put Inyo-Mono IRWMP's implementation projects at a competitive disadvantage against regions with more financial resources and more capacity in place for developing proposals. Rather than being granted a preference, the prevalence of disadvantaged communities in the Inyo-Mono region appears to have hampered our funding outlook.

I respectfully urge CDWR to revise its allocation of \$0 to the Inyo-Mono IRWMP, and provide full funding for the projects submitted in the Inyo-Mono IRWMP. Thank you for your consideration of these comments. The CDWR staff has my respect and gratitude for their efforts in implementing the IRWM program.

Sincerely,

Robert Harrington  
Water Director, Inyo County

cc: Board of Supervisors  
Water Commission  
H. Alpert, Inyo-Mono IRWMP